

Theodore A. Griffinger, Jr. (SBN 66028)
Tanya Herrera (SBN 177790)
STEIN & LUBIN LLP
Transamerica Pyramid
600 Montgomery Street, 14th Floor
San Francisco, CA 94111
Telephone: (415) 981-0550
Facsimile: (415) 981-4343
tgriffinger@steinlubin.com
therrera@steinlubin.com

Attorneys for Defendants,
JON SABES, STEVEN SABES AND MARVIN
SIEGEL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SUZANNE D. JACKSON,

Plaintiff,

v.

WILLIAM FISCHER; JON SABES;
STEVEN SABES; DAVID GOLDSTEEN;
MARVIN SIEGEL; BRIAN CAMPION;
LONNIE BROOKBINDER; CHETAN
NARSUDE; MANI KOOLASURIYA;
JOSHUA ROSEN; UPPER ORBIT, LLC;
SPECIGEN, INC.; PEER DREAMS INC.;
NOTEBOOKZ INC.; ILEONARDO.COM
INC.; NEW MOON LLC; MONVIA LLC;
and SAZANI BEACH HOTEL,

Defendants.

Case No. 3:11-cv-02753-JSC

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME TO
RESPOND TO COMPLAINT;
DECLARATION OF TANYA HERRERA
IN SUPPORT**

1 Plaintiff Suzanne Jackson and defendants Marvin Siegel, Jon Sabes and Steven
2 Sabes, (together "Defendants"), by and through their counsel, and subject to the Court's approval,
3 stipulate as follows:

4 WHEREAS, Plaintiff served her First Amended Complaint on December 5, 2011;

5 WHEREAS, the parties previously stipulated that Defendants' last day to answer
6 or otherwise respond to Plaintiff's First Amended Complaint would be January 13, 2011;

7 WHEREAS, Defendants have requested an additional extension of time to answer
8 or otherwise respond to the First Amended;

9 WHEREAS, Plaintiff has agreed to extend Defendants' time to answer or
10 otherwise respond to the First Amended Complaint to January 27, 2012;

11 WHEREAS, Defendants have agreed that Plaintiff's opposition to the motion to
12 dismiss will be due on or before February 24, 2012;

13 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY AND
14 BETWEEN THE PARTIES that, subject to the Court's approval, Defendants shall answer or
15 otherwise respond to the First Amended Complaint on or before January 27, 2012.

16 Dated: January 9, 2012

SHEPPARD MULLIN RICHTER
& HAMPTON LLP

17 By: /s/ Robert J. Stumpf, Jr.

18 Robert J. Stumpf, Jr.
19 Attorneys for Plaintiff
20 SUZANNE D. JACKSON

21 Dated: January 9, 2012

STEIN & LUBIN LLP

22 By: /s/ Tanya Herrera

23 Tanya Herrera
24 Attorneys for Defendants
25 MARVIN SIEGEL, JON SABES and STEVEN
26 SABES
27
28

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: _____

DECLARATION OF TANYA HERRERA

I, Tanya Herrera, declare as follows:

1. I am of counsel at Stein & Lubin LLP, counsel for defendants Marvin Siegel, Jon Sabes and Steven Sabes ("Defendants") in this action. I have personal knowledge that the facts set forth in this declaration are true and correct and, if called as a witness, could and would testify thereto.

2. As set forth in the attached stipulation, the parties previously agreed that Plaintiff would file her First Amended Complaint on or before December 2, 2011 and Defendants would answer or otherwise respond to the First Amended Complaint on or before January 13, 2012. Defendants intend to file a motion to dismiss pursuant to Federal Rule of Civil Procedure 12(b)(6) and will seek a mutually convenient hearing date.

3. The reason for the requested extension is to give Defendants' counsel additional time to consider the new allegations and claims for relief in Defendants' First Amended Complaint. With the exception of the previous stipulation have been no previous time modifications in this action.

4. The requested extension of time should not have any significant impact on the schedule for the case, given that the initial case management conference and first available hearing dates are in April, 2012.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 9th day of January 2012 at San Francisco, California.

/s/ Tanya Herrera
Tanya Herrera